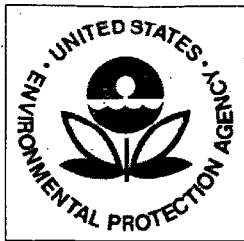


09/28/07



**US Environmental Protection Agency**

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**Second Five-Year Review Report**

**For**

**Kerr-McGee Chemical Corp. (Soda Springs)  
Superfund Site**

**Caribou County, Idaho**

**September 2007**



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of Engineers®**  
Seattle District

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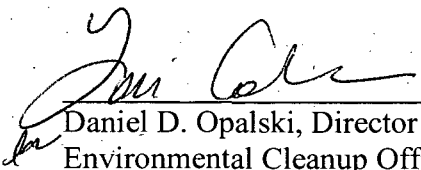
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**PREPARED FOR:**

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9/28/07  
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## List of Acronyms

|        |   |
|--------|---|
| ARAR   | Applicable or relevant and appropriate requirements                   |
| CERCLA | Comprehensive Environmental Response, Compensation, and Liability Act |
| CFR    | Code of Federal Regulations   |
| CD     | Consent Decree  |
| COC    | Contaminants of Concern   |
| EPA    | United States Environmental Protection Agency                         |
| FML    | Fabric Membrane Liner   |
| KMCC   | Kerr-McGee Chemical Corporation/Tronox, Inc.                          |
| MCL    | Maximum Contaminant Levels  |
| µg/L   | Micrograms per liter  |
| NCP    | National Contingency Plan   |
| NPL    | Superfund National Priorities List                                    |
| O&M    | Operation and Maintenance   |
| OU     | Operable unit   |
| PRP    | Potentially Responsible Party   |
| RAO    | Remedial Action Objectives  |
| RBC    | Risk Based Concentrations   |
| RD     | Remedial Design/Remedial Action                                       |
| RI/FS  | Remedial Investigation/Feasibility Study                              |
| ROD    | Record of Decision  |
| S-X    | Solvent Extraction  |
| TBP    | Tributyl phosphate  |
| TPH    | Total Petroleum Hydrocarbon   |
| USACE  | U.S. Army Corps of Engineers  |

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## Executive Summary

The Kerr-McGee Chemical Corporation (KMCC) Superfund Site in Soda Springs, Idaho consists of a single operable unit. KMCC (now Tronox, Inc.), operated a vanadium production facility beginning in March 1964. The facility was placed on the National Priorities List (NPL) on October 4, 1989, and a Record of Decision (ROD) was signed on September 28, 1995.

The waste by-products of vanadium production (calcine, roaster, and solvent extraction (S-X) solids) were transported to three different ponds using water. The carrier water interacted with the solids in the unlined ponds and contaminants leached into the local groundwater. The groundwater beneath and downgradient from the site exists predominantly within the basalt sequences.

The six chemicals of concern (COCs) identified in the Risk Assessment (EPA, 1993) include arsenic, manganese, molybdenum, tributyl phosphate (TBP), total petroleum hydrocarbons (TPH), and vanadium.

The Remedial Action for the site included:

- Elimination of uncontrolled liquid discharges from the site;
- Landfilling solids from the ponds at an on-site landfill;
- In-place capping of the wind-blown calcine, roaster reject, reject fertilizer, and active calcine tailings during 2000 and 2001;
- Semi-annual groundwater monitoring to determine the effectiveness of source control measures in achieving risk-based groundwater performance standards, and;
- Establishment of institutional controls in affected off-site areas to prevent ingestion of groundwater for as long as the groundwater exceeds the risk-based concentrations.

A ROD Amendment was signed on July 13, 2000, which changed the remedy for the reuse/recovery of the calcine solids. The final remedy selection included capping of the calcine, roaster reject, and rejected (off-spec) fertilizer.

Two issues were identified during the first Five-Year Review. The change in the Maximum Contaminant Level (MCL) for arsenic and repair problems at the calcine cap location. No actions were taken to address the change in the MCL for arsenic. Over seeding, weed control, and fence repair work were performed to address damage to the calcine cap that occurred during winter storms in the first year.

Since the first Five-Year Review, there have been no changes in the physical conditions of the site that would affect the protectiveness of the remedy. The calcine cap was repaired and erosion is no longer an issue. Semi-annual monitoring of the groundwater continues. Groundwater monitoring data reveal, after initially decreasing, trends for a number of COCs have been relatively flat since the late 1990s and remain above risk-based cleanup goals identified in the ROD. In some cases, trends for certain COCs at specific monitoring wells have been increasing over the last several years. Because groundwater cleanup goals have not been achieved within

the 10 year period predicted in the ROD, and trends for some COCs are flat or upwards at some wells, additional assessment of the practicability of the remedy in meeting the cleanup goals is recommended.

No changes in standards or toxicity factors for the COCs have been made that would affect the protectiveness of the remedy.

This is the second Five-Year Review for the Kerr-McGee Site. The assessment of this Five-Year Review found that the remedies were constructed in accordance with the requirements of the ROD; however a protectiveness determination of the remedy cannot be made until further information is obtained. This is because levels of COCs in groundwater and surface water remain above cleanup goals and recent trends call into question the likelihood of achieving those goals in the foreseeable future. Further information will be obtained by taking the following actions:

- Evaluate practicability of remedy in achieving cleanup goals;
- Evaluate adequacy of current groundwater monitoring network for identifying the offsite migration of COCs;
- Assess whether current groundwater and surface water performance standards are still applicable; and
- Work with the laboratory providing analytical services to reduce the groundwater detection and reporting limits to less than the MCL for arsenic.

It is expected that these actions will take approximately fifteen months to complete, at which time a determination of protectiveness will be made.

## Five-Year Review Summary Form

### ***SITE IDENTIFICATION***

**Site name (from WasteLAN):** Kerr-McGee Chemical Corporation (Soda Springs)

**EPA ID (from WasteLAN):** IDD041310707

**Region:** 10

**State:** ID

**City/County:** Soda Springs (1 mile north)/Caribou

### ***SITE STATUS***

**NPL status:** Final ☐ Deleted ☐ Other (specify) \_\_\_\_\_

**Remediation status** (choose all that apply): ☐ Under Construction ☐ Operating ☐ Complete

**Multiple OUs?\*** ☐ YES ☐ NO

**Construction completion date:** 9 / 26 / 2001

**Has site been put into reuse?** ☐ YES ☐ NO

### ***REVIEW STATUS***

**Lead agency:** EPA ☐ State ☐ Tribe ☐ Other Federal Agency \_\_\_\_\_

**Author name:** Kathryn Carpenter / Richard Garrison

**Author title:** Project Manager / Geologist

**Author affiliation:** USACE Seattle District

**Review period:\*\*** 6 / 1 / 2007 to 9 / 28 / 2007

**Date(s) of site inspection:** 6 / 21 / 2007

**Type of review:**

- Post-SARA ☐ Pre-SARA ☐ NPL-Removal only ☐  
☐ Non-NPL Remedial Action Site ☐ NPL State/Tribe-lead ☐  
☐ Regional Discretion

**Review number:** ☐ 1 (first) ☐ 2 (second) ☐ 3 (third) ☐ Other (specify) \_\_\_\_\_

**Triggering action:**

- ☐ Actual RA Onsite Construction at OU # \_\_\_\_\_ ☐ Actual RA Start at OU# \_\_\_\_\_  
☐ Construction Completion Previous Five-Year Review Report  
☐ Other (specify) \_\_\_\_\_

**Triggering action date (from WasteLAN):** 9 / 30 / 2002

**Due date (five years after triggering action date):** 9 / 30 / 2007

\* ["OU" refers to operable unit.]

\*\* [Review period should correspond to the actual start and end dates of the Five-Year Review in WasteLAN.]

## Five-Year Review Summary Form, cont'd.

### Issues:

- 1) Concentrations of contaminants of concern in groundwater and surface waters remain above RBCs and are exhibiting either flat or upward trends.
- 2) The routine laboratory reporting limit for arsenic in groundwater is greater than the MCL.

### Recommendations and Follow-up Actions:

#### Follow-up Actions related to Issue 1)

- 1) Evaluate practicability of remedy in achieving cleanup goals;
- 2) Evaluate adequacy of current groundwater monitoring network for identifying the offsite migration of COCs
- 3) Assess whether current groundwater and surface water performance standards are still applicable

#### Follow-up Action related to Issue 2)

- 1) Work with the laboratory providing analytical services to reduce the groundwater detection and reporting limits to less than the MCL for arsenic.

### Protectiveness Statement(s):

A protectiveness determination of the remedy cannot be made until further information is obtained. Further information will be obtained by taking the above Follow-up Actions.

It is expected that these actions will take approximately fifteen months to complete, at which time a determination of protectiveness will be made

### Other Comments:

## **1.0 Introduction**

### **1.1 Purpose of the Review**

The purpose of Five-Year Reviews is to determine whether the remedy at a site is protective of human health and the environment. The methods, findings, and conclusions of reviews are documented in Five-Year Review reports. In addition, Five-Year Review reports identify issues found during the review, if any, and recommendations to address them.

### **1.2 Authority for Conducting the Five-Year Review**

The U.S. Environmental Protection Agency (EPA) prepared this Five-Year Review pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) §121 and the National Contingency Plan (NCP). CERCLA §121 states:

*If the President selects a remedial action that results in any hazardous substances, pollutants, or contaminants remaining at the site, the President shall review such remedial action no less often than each five years after the initiation of such remedial action to assure that human health and the environment are being protected by the remedial action being implemented. In addition, if upon such review it is the judgment of the President that action is appropriate at such site in accordance with section [104] or [106], the President shall take or require such action. The President shall report to the Congress a list of facilities for which such review is required, the results of all such reviews, and any actions taken as a result of such reviews.*

EPA interpreted this requirement further in the NCP; 40 CFR §300.430(f)(4)(ii) states:

*If a remedial action is selected that results in hazardous substances, pollutants, or contaminants remaining at the site above levels that allow for unlimited use and unrestricted exposure, the lead agency shall review such action no less often than every five years after the initiation of the selected remedial action.*

### **1.3 Who Conducted the Five-Year Review**

EPA Region 10 has conducted a Five-Year Review of the remedial actions implemented at the Kerr-McGee Chemical Corporation Superfund Site in Caribou County, Idaho. This review was conducted for the entire site from June 2007 through September 2007. This report documents the results of the review.

The U.S. Army Corps of Engineers (USACE) provided support to EPA in the data analysis and evaluation of remedy protectiveness for this Five-Year Review. The USACE also conducted the site inspection on behalf of EPA.

### **1.4 Other Review Characteristics**

This is the second Five-Year Review for the Kerr-McGee Chemical Corporation Superfund Site. The triggering action for this review was the first Five-Year Review completed in September 2002. The Five-Year Review is required by statute because the ROD was signed after October

17, 1986 and hazardous substances, pollutants, or contaminants remain at the site above levels that allow for unlimited use and unrestricted exposure.

## **2.0 Site Chronology**

Table 1 presents a brief summary of site events:

**Table 1 Chronology of Site Events**

| <b><u>Event</u></b>                                   | <b><u>Date</u></b> |
|---|--------------------|
| Initial Discovery of Problem                          | April 1981         |
| Preliminary Assessment by State of Idaho              | May 1985           |
| Site Investigation                                    | April 1988         |
| NPL Listing   | October 4, 1989    |
| Remedial Investigation/Feasibility Study Completed    | September 25, 1995 |
| ROD Signature   | September 28, 1995 |
| Remedial Design Start                                 | December 16, 1996  |
| Remedial Design Completed                             | July 17, 1997      |
| Remedial Action Start (Construction Start)            | July 17, 1997      |
| Consent Decree with PRP                               | August 21, 1997    |
| ROD Amendment   | July 13, 2000      |
| Construction Complete                                 | September 26, 2001 |
| Vanadium plant dismantled                             | May 2002           |
| First Five-Year Review Completed                      | September 30, 2002 |
| Constructed north infiltration basins                 | October 2002       |
| Fertilizer building dismantled                        | June 2003          |
| Reclaim Stormwater Runoff Ponds                       | October 2003       |
| Reclaim 5-Acre Ponds                                  | October 2004       |
| Constructed south infiltration basins & snow fencing  | November 2004      |
| KMCC Purchased adjacent property                      | 2004               |
| Kerr McGee chemical division reincorporates as Tronox | March 2006         |

## **3.0 Background**

### **3.1 Physical Characteristics**

The site is located within the Bear River Basin which is characterized by broad, flat valleys with a few scattered topographic features including cinder cones, rhyolitic domes, and uplifted fault blocks. The site lies in a valley at approximately 6,000 feet elevation. The valley is bordered by northwest trending mountain ranges reaching approximately 8,000 feet in elevation.

The northern boundary of the Bear River Valley drainage basin is formed by the Blackfoot Reservoir, located approximately thirteen miles north of the KMCC site. Surface drainage in the valley is predominantly to the south. Natural springs are important hydrologic features of the basin, and emerge at several locations to the ground surface as result of discharge from the

underlying groundwater aquifer. There are no known floodplain zones, endangered species, or historical or archeological sites in the immediate vicinity of the site. There is a small wetland (Finch Spring/Pond) about one mile south of the site.

### **3.2 Land and Resource Use**

The KMCC site is located about three miles north of Soda Springs, Idaho, on State Route 34. The site has expanded from its original 50 acres to about 547 acres in size. The area surrounding the site is agricultural, primarily grain crops. Directly across the highway is the large Monsanto Corporation phosphate processing plant. The entire area north of Soda Springs is rural in nature (Figure 1). The Soda Springs facility is now owned and operated by Tronox, Inc., where lithium manganese oxide used in manufacturing lithium manganese batteries is produced.

### **3.3 History of Contamination**

Kerr-McGee Chemical Corporation operated a vanadium production facility in Caribou County beginning in March 1964. Kerr-McGee used large unlined man-made ponds and impoundments on site to manage their process wastes. The two main ponds experienced significant containment failures, including the loss of approximately two and one half million gallons from the S-X pond in April 1981. A site investigation conducted in April 1988 identified hazardous substances in waste ponds on site including arsenic, cadmium, chromium, lead, and organic compounds. Pond failures totaling approximately 750,000 gallons were documented in September and November, 1989.

The KMCC Soda Springs Plant, was placed on the National Priorities List on October 4, 1989. The Remedial Investigation and Feasibility Studies were completed by KMCC on June 15, 1995. The Record of Decision was signed on September 28, 1995, and a Consent Decree implementing the remedy required by the ROD was entered by the court on August 21, 1997. The vanadium plant was closed in January 1999 because of economic considerations and fully dismantled by June 2002.

The footprint of the vanadium plant was covered with limestone fines and recontoured to provide positive drainage away from the site of the former plant. The fertilizer plant, constructed in 1997 to reuse/recycle calcine tailings and roaster rejects, was shut down in the second quarter of 2002 and subsequently dismantled. The surface footprint was cleaned and regraded.

The vanadium processing created three different waste streams which were liquefied for transport and were originally discharged to unlined ponds on the property (Figure 2). The three waste stream ponds are identified as:

- Calcine Ponds
- Scrubber Pond
- S-X Pond

Calcine is a generic term for the fine-grained, black, sandy material which is the major by-product of the vanadium production. Calcine tailing was originally impounded on the west side of the plant for the first ten years of operation. Then in 1973, this impoundment was covered

with topsoil and seeded to prevent wind blown fugitive dust. The calcine tailings were then shifted to diked ponds on the eastern side of the plant.

The waste by-products of vanadium production (calcine, roaster, and S-X solids) were transported to the three different ponds using water. The carrier water interacted with the solids in the unlined ponds and contaminants leached into the local groundwater. Six COCs were identified through the risk assessment process:

- Arsenic
- Manganese
- Molybdenum
- Vanadium
- Tributyl phosphate (TBP)
- Total Petroleum Hydrocarbon (TPH)

The groundwater beneath and downgradient from the site exists predominantly within the basalt sequences. The underlying Salt Lake Formation bounds the hydrogeology about 230 feet below ground surface. The basalt sequence is comprised of five basalt flows. At the KMCC site the hydraulic conductivities are all relatively similar. Water quality and aquifer test data indicate that the entire thickness of saturated basalt is in relatively good vertical hydraulic connection over the entire KMCC site. Faults in the basalt flows represent zones of increased transmissivity and help to explain the flow of contaminants downgradient.

Groundwater monitoring wells are screened at two levels: shallow (15-40 feet below ground surface [bgs]), and deeper (125-150 feet bgs). The regional groundwater flow is north to south; however the flow at the KMCC site tends towards the west because of groundwater pumping by the Monsanto plant west of the KMCC site. Once the contaminants enter a fault in the basalt formation the flow follows the easier pathway which is southerly. Groundwater monitoring also indicates some of the groundwater reaches the surface water (Ledger Creek, Big Spring, and Finch Spring). These surface waters are not currently drinking water sources. The groundwater contaminant plume has not changed since the ROD, however, there has been a reduction in the contaminant concentrations.

The contaminants impacted both the groundwater under the facility and surface water downgradient for a distance of about one-half mile. Neither of these sources has been utilized as a potable water source.

### **3.4 Initial Response**

There were no remedial actions taken prior to the signing of the EPA ROD.

### **3.5 Basis for Taking Action**

The basis for taking action and cleaning up this site is from the human health risk associated with the contaminated groundwater originating from the KMCC site. There was also some risk to health from the ingestion/direct contact with roaster reject material having high vanadium concentrations. Both of these sources are addressed in the ROD.



A summary of groundwater concentrations and RBCs is shown in Table 2. The location with the current (as of May 2007) highest concentration is KM-8, located within the site boundaries, southwest of the S-X pond.

**Table 2 Concentration of COCs**

| <b>COC</b> | <b>RBC<br/>(µg/L)</b> | <b>Highest<br/>Concentration<br/>RI/FS to Present<br/>(µg/L)</b> | <b>Current<br/>(May 2007)<br/>Highest<br/>Concentration<br/>(µg/L)</b> | <b>Location of Current Highest<br/>Concentration</b> |
|------------|-----------------------|--|--|--|
| Arsenic    | 10                    | 150  | 90   | KM-8   |
| Manganese  | 180                   | 8,770  | 5,000  | KM-8   |
| Molybdenum | 180                   | 165,000  | 41,000   | KM-8   |
| Vanadium   | 260                   | 28,600   | 18,000   | KM-8   |
| TBP        | 180                   | 4,442  | 590  | KM-8   |
| TPH        | 730                   | 9.5  | 1.5  | KM-8   |

#### **4.0 Remedial Actions**

The remedial action objectives for cleanup of the KMCC site are:

- Prevent the transport of COC to the groundwater from facility sources that may result in COC concentrations in groundwater exceeding Risk Based Concentrations (RBCs) or Maximum Contaminant Limits for drinking water;
- Prevent ingestion by humans of groundwater containing COC having concentrations exceeding RBCs or MCLs;
- Prevent transport of COC from groundwater to surface water in concentrations that may result in exceedences of RBCs or MCLs in the receiving surface water body.

The ultimate goal of the remedial action is to restore groundwater that has been impacted by site sources to meet all RBCs or MCLs for the COCs.

- Prevent the ingestion/direct contact with the roaster reject area material having vanadium concentrations in excess of 14,000 mg/kg.

#### **4.1 Remedy Selection**

The ROD for the KMCC site was signed on September 28, 1995, and amended on September 13, 2000. The selected remedy addresses the three pathways of concern: groundwater, roaster reject, and windblown calcine. The ROD remedy selection for groundwater included elimination of uncontrolled liquid discharges from the site (the main source of groundwater impacts), recycling of solid sources (later amended), groundwater monitoring, and institutional controls.

The Remedial Action for the site included:

- Elimination of uncontrolled liquid discharges from the site;
- Landfilling solids from the ponds at an on-site landfill;
- In-place capping of the wind-blown calcine, roaster reject, reject fertilizer, and active calcine tailings during 2000 and 2001;
- Semi-annual groundwater monitoring for the COC to determine the effectiveness of source control; and
- Establishment of institutional controls (deed restrictions, limited access, well restrictions and/or well-head protection) in affected off-site areas to prevent ingestion of groundwater for as long as the groundwater exceeds the risk-based concentrations.

The ROD contains a provision whereby the remedy and/or performance standards are to be reevaluated should contaminant levels in groundwater cease to decline and remain constant at levels higher than the remediation goal over some portion of the plume.

As part of the overall site strategy, though not part of the selected remedy, KMCC developed and submitted to EPA and the State of Idaho a waste minimization/treatment plan to eliminate liquid discharges to groundwater from the facility within two years. The plan included:

- Construction of new lined ponds to contain the main source of groundwater contamination (S-X raffinate that discharged to leaking unlined ponds);
- Construction and operation of a phosphoric acid plant to consume scrubber water and calcine tailings to produce phosphoric acid, ammoniated phosphate, and gypsum fertilizers as marketable products.

A ROD Amendment was signed on September 13, 2000, which changed the remedy for the reuse/recycling of the calcine tailings and roaster reject materials to containment. The fertilizer process did not prove successful and the capping alternative for this waste material, which was included in the feasibility study, was subsequently selected as part of the remedy for this site. The final remedy selection included capping of the calcine, roaster reject, and rejected (off-spec) fertilizer.

All elements of the selected remedy have been completed.

#### **4.2 Remedy Implementation**

A Consent Decree (CD) signed by EPA and KMCC was entered by the court on August 21, 1997. In the CD KMCC agreed to implement the ROD and pay past EPA costs for cleaning up the site.

The Remedial Action (RA) took place in two parts because of the ROD Amendment. The initial RA construction activity was the building of an on-site landfill for the S-X and scrubber pond solids. The Remedial Design (RD) was started on December 16, 1996, and completed on July 17, 1997, which implemented the ROD. The construction process began on July 17, 1997, and was functionally completed on October 10, 1997. In accord with the selected remedy, which required

"elimination of the uncontrolled liquid discharges as soon as practicable," the following actions were taken between 1995 and 1997:

1. An on-site landfill was constructed to contain pond solids and the 3 large, unlined ponds were closed. The landfill was constructed with primary and secondary liners, leachate collection, and an engineered cover. Some of the waste in the ponds was saturated so the leachate is collected from a sump in the bottom liner.
2. In the context of continuing operations, Kerr-McGee constructed three lined ponds totaling 20 acres to replace the solvent-extraction (S-X) pond, which was one of three sources of groundwater contamination. Two HDPE-lined 5-acre ponds located north of the facility were constructed in 1996. An additional 10-acre HDPE lined pond was constructed during August 1997. The S-X Pond was also located originally on the west side of the facility. The pond was taken out of service in 1995 and the location filled and planted. Sediments that were excavated from the pond were transported and contained in the on-site landfill with the scrubber pond sediments.
3. The scrubber pond, a second source, was replaced by adding two baghouse systems to plant operations. The scrubber pond was located on the southeast corner of the facility, directly south of the recently capped calcine waste. The scrubber pond was operational for 22 years before the scrubbers were replaced by the baghouse. The sediments from the scrubber pond were removed and combined with the S-X waste sediment and contained on-site in a lined engineered landfill.;
4. The third source, calcine tailings placed in unlined ponds, was to be addressed by excavation and reuse/recycling. Reuse/recycling was found to be impractical and cost-prohibitive, and EPA issued an Amended ROD to change the remedy to another alternative from the Feasibility Study; consolidation and capping.

The ROD Amendment required some additional design work to consolidate the calcine waste and rejected fertilizer into a containment area and then cap. The second RA dealt with the calcine tailings waste stream. This waste stream ceased with the end of vanadium production in 1999 and the design and construction of the cap was initiated. The design of the calcine cap was received by EPA on February 18, 2001, and the design finalized on May 4, 2001. The CERCLA engineered multi-layered cap over the calcine tailings was constructed in 2001 creating a low permeable cap.

The construction of the cap over the calcine landfill began with the regrading of the calcine pile beginning on May 8, 2001. The rejected fertilizer had been returned to the calcine pile in October 2000 in preparation of the capping action. The calcine waste containment area was covered with a medium weight plastic flexible membrane liner (FML), geocomposite, subsoil, and topsoil. Fencing and seeding were the last actions and were completed in August 2000. An EPA construction Preliminary Close Out Report was completed on September 26, 2001, documenting that all the landfill caps were operational and functional and construction of the remedy was complete.

Institutional controls include deed restrictions, limiting access, and well restrictions and/or well-head protection. Implementation of institutional controls included the purchase of the Hopkins property to the south of the facility in order to gain control over the potential use of impacted groundwater. The contamination extends beyond the former Hopkins property and onto City property. The City of Soda Springs currently has restrictions on groundwater development or use that would further limit potential exposure to impacted groundwater. Other impacted properties include the rail road right-of-way and the Highway 34 right-of-way, both of which have tight controls over any potential subsurface explorations that could expose impacted groundwater. To restrict access, the facility is fenced.

In 2002, an infiltration pond was constructed on the north side of the calcine containment area to capture precipitation runoff from the cap. In 2004, another infiltration pond was completed on the south side of the cap. After observing snow drifts piling on the cap and increasing the amount of percolation through the cap, a snow fence was erected along the south side of the facility, in line with the cap.

A plan is being developed to construct a landfill on-site to hold solids from the 10-acre pond constructed in 1997. The 10-acre pond, which is lined, holds residual solids from vanadium plant operations during 1996 to 2000. The pond was permitted by the State in 1995. The 1995 ROD only addressed process wastes going to unlined ponds so this action is being undertaken by Tronox, Inc. outside of the CERCLA process and under IDEQ review. The design for the landfill is complete and is currently being reviewed by IDEQ. The plan includes stabilizing the residual material by mixing it with native soils, placing the material into a new landfill, and covering with a cap similar to the one on the existing calcine landfill.

Groundwater modeling performed for the RI/FS predicted that within ten years of implementation of the selected remedy (source control) levels of vanadium, molybdenum, arsenic, and manganese would achieve the health-based performance standards; levels of TPH and TBP were predicted to achieve the performance standards in 30 years or less (possibly much less if degradation occurs). There is no current estimate of when concentrations of COC will achieve the performance standards.

#### **4.3 System Operations/Operation and Maintenance**

Tronox, Inc. is conducting long-term operations and maintenance (O&M) at this site. Currently semi-annual groundwater monitoring is occurring with reports sent to EPA. The cap and ponds are subject to an annual detailed inspection for cracking, animal burrows, settlement, and drainage as well as fence and gate condition. The O&M of the capped waste areas is limited to cap protection, cover crop, fencing, and erosion control. After the first year of operation the scrubber/S-X landfill has not required any significant O&M to maintain the cap. Some O&M of the calcine cap was required because of first year erosion. Some over seeding and weed control was done on the cover crop.

Long-term groundwater sampling has been on-going since the ROD was signed and is continuing. This activity is adequately funded and a budget for the future is in-place by Tronox, Inc., including maintaining a one million dollar bond with EPA. The O&M work on the caps is part of the Tronox, Inc. maintenance budget for the facility.

The visual inspection of the site for this Five-Year Review confirmed that the condition of the caps were still able to provide the protectiveness required by the ROD. Repairs made to the calcine cap to address erosion issues, including replacing topsoil, were effective and no additional work is necessary.

## **5.0 Progress Since the Last Five-Year Review**

Two issues were identified during the last Five-Year Review. The change in the MCL for arsenic and the minor O&M repair problems at the calcine cap location. The MCL for arsenic was changed from 50 µg /L to 10 µg /L in 2001. There is one on-site monitoring well that currently has arsenic concentrations greater than 10 µg/L: 90 µg/L at KM-8. The laboratory analyses used a reporting limit of 10 to 15 µg/L during the second Five-Year Review period.

Some erosion occurred on the calcine cap during the first growing season and was addressed during the First Five-Year Review period. This prompted Tronox, Inc. to construct the infiltration ponds and snow fences. The snow fences were installed to minimize snow drifting into the ponds, thus reducing the amount of water to manage on the site.

## **6.0 Five-Year Review Process**

### **6.1 Administrative Components**

Tronox, Inc. was notified of the initiation of the Five-Year Review in May, 2007. The Five Year Review team was led by William Ryan of Region 10 EPA, Remedial Project Manager for the site with technical assistance provided to EPA by the Seattle District, U.S. Army Corps of Engineers. By 1 June 2007, the review team had been formed and had established the review schedule and its major components including:

- Document Collection and Review
- Data Assessment/Analysis
- Site Inspection
- Interviews and Community Notification and Involvement
- Five-Year Review Report Development and Review.

The due date for this review is 28 September 2007.

### **6.2 Community Notification and Involvement**

In July 2007, EPA sent postcard notices to those listed on EPA's Kerr-McGee Site mailing list and published a public notice in the Caribou County Sun on July 19, 2007 announcing that this FYR was being initiated and explaining how interested parties could get involved. Copies of both are contained in Attachment 2. Only one response was received, a call from an employee of Idaho Department of Fish and Game asking for information about the planned review. Within 30 days of signature on this Report, EPA will publish another notice and summary of the Review.

### **6.3 Document Review**

A review of reports pertinent to this Five-Year Review was conducted. The types of documents reviewed included the ROD (1995), the ROD Amendment (2000), the 2006 monitoring annual data report, available 2007 monitoring data, and the First Five-Year Review (2002). The documents reviewed for this report are listed in Attachment 3.

### **6.4 Data Review**

Monitoring wells that were installed as part of the Remedial Investigation have been sampled semi-annually since October 1991. Since the removal of the S-X Scrubber Pond and the Roaster Scrubber Pond, the concentration of the COCs in the groundwater have been generally decreasing.

Annual precipitation declined after 1997 to about 11.5 inches in 2000, 2001 and 2003, and then has been increasing on average to just over 15 inches annual average in 2005.

Site groundwater level changes over time correlate to some degree to variation in precipitation. Overall, water levels dropped on average 5 to 8 feet between 1997 and October 2001, and then remained at lowered levels in the fall through 2004. Water levels recovered significantly between 2004 and 2006, to within the range of levels observed in 1997. Water levels are typically higher by about 2 to 3 feet in the spring and lower in the fall.

During the First Five-Year Review period, groundwater concentration of several of the COCs decreased significantly, reflecting the continued downward trend since the implementation of the remedial activities in 1997. However, no groundwater or surface water cleanup goals had been met. During this second Five-Year Review period, observation of trends for the COCs have shown that though the concentration of each contaminant decreased significantly when the remedial design began operating, the concentrations of vanadium, molybdenum, and manganese in many wells remain above the RBCs and since the late 1990s have exhibited flattened trends. In some cases, concentrations of these COCs at specific monitoring wells have been increasing over the last several years. The highest concentrations for these three contaminants are located generally downgradient of the former S-X pond and the former scrubber pond. Concentrations remain above the RBCs off-site, though only molybdenum remains above the RBC in springs located further downgradient.

Current evaluation of the long term trends suggest that these contaminants will likely remain present in the groundwater for much longer than twenty years. Concentrations of arsenic at a single well near the former S-X pond remain well above the MCL of 10 µg/L though they have decreased somewhat since implementation of the remedy (calcine cap) in 2001. Arsenic levels at all other wells appear to be at or below the MCL. In all cases, it is difficult to determine whether the arsenic MCL has been (or will be) met because the current reporting limit being used in groundwater analyses is approximately 10 µg/L. Predictions that levels of vanadium, molybdenum, arsenic and manganese would meet health-based performance standards within 10 years of remedy implementation have not been met.

Tributyl Phosphate and TPH concentrations are just above or below their RBCs with no discernable trend suggesting no change for a long period of time. Groundwater modeling

supporting the ROD predicted that these two COCs would achieve performance standards within 30 years (or less) of remedy implementation.

Monsanto has collected surface water data from Big Spring and City Park Spring as part of the remedial action at its adjacent facility. Recent monitoring data (summarized in Table 3) reveal the presence of molybdenum, a contaminant historically associated with the Kerr-McGee facility. A review of available data indicates that concentrations are declining at both locations; however, concentrations are still greater than the RBC of 180 µg/L. No one is relying on these particular locations for drinking water.

**Table 3 Summary of Molybdenum Concentrations in Big Spring and City Park Spring from Monsanto Monitoring**

| Year | Big Spring<br>(µg/L) | City Park Spring<br>(µg/L) |
|------|----------------------|----------------------------|
| 2002 | 320                  | 300                        |
| 2003 | NA                   | NA                         |
| 2004 | 284                  | 240                        |
| 2005 | 250                  | 245                        |
| 2006 | 215                  | 197                        |

## **6.5 Site Inspection**

A site inspection was conducted on 25 July 2007. The inspection team consisted of two representatives from USACE, one representative from IDEQ, two Tronox, Inc. representatives, and their consultant. The site inspection checklist is included as Attachment 4. The purpose of this inspection was to assess the protectiveness of the remedy, including the integrity of the caps, the condition of the monitoring wells and restrictive fencing. Tronox, Inc.'s consultant presented a slide show of site history, geological conditions, and remedial activities before leading a site walk. The site inspection was limited to the facility and off-site well locations.

## **6.6 Interviews**

The Tronox, Inc. and IDEQ representatives were the only parties interviewed as part of this Five-Year Review. The interview was conducted as part of the Site Inspection. No other party has shown an interest in this Superfund site.

## **7.0 Technical Assessment**

### **7.1 Question A: Is the remedy functioning as intended by the decision documents?**

No. While the various components of the remedy have been constructed as designed, groundwater monitoring data reveal, after initially decreasing, trends for a number of COCs have been relatively flat since the late 1990s and remain above risk-based cleanup goals identified in the ROD. In some cases, trends for certain COCs at specific monitoring wells have been increasing over the last several years. Because groundwater cleanup goals have not been

achieved within the 10 year period predicted in the ROD, and the trends for some COCs are flat or upwards at some wells, additional assessment of the practicability of the remedy in meeting the cleanup goals is recommended.

The review of the documents, ARARs, risk assumptions, and the results of the site inspection indicates that the remedy has been implemented as intended by the ROD and ROD Amendment. The waste lagoons have all been taken out of service and the process flows into them have ceased. The elimination of uncontrolled releases of process water to groundwater to the various ponds had a positive impact to the concentration of the COCs measured in the groundwater. Capping the waste sludges, calcine, and off-spec fertilizer has also reduced the continued leaching of COCs from the wastes. Capping system performance was improved by erecting a snow fence to minimize snow drifts, thereby reducing the amount of water to manage on the site. Infiltration ponds were added to two sides of the cap to capture runoff water. Plans for additional optimization include construction of an on-site landfill to hold solids from the 10-acre pond. The capping of the contaminated wastes has achieved the remedial objectives to prevent direct contact with contaminants in the waste ponds and the calcine waste that was blown around the site by winds. The caps are being maintained for cap integrity; no burrowing animals were evident, nor were there any deep-rooted plants that had established themselves on the cap. Only a small amount of leachate continues to be produced by the scrubber/S-X pond landfill and is pumped annually.

While capping and other remedial actions intended to achieve the RAO to minimize the migration of contaminants to groundwater have been implemented, levels of COCs in groundwater remain above RBCs, raising some uncertainty as to the ability of the implemented remedy to achieve the goal of restoring groundwater impacted by site sources.

Institutional controls are in place, and much of the property surrounding the offsite contaminated groundwater plume has been purchased and is under control by Tronox, Inc. to ensure the institutional controls remain effective. The City of Soda Springs restricts the development or use of groundwater, which further limits the potential for exposure to COCs from the site. Nothing was observed that would suggest that the institutional controls were ineffective or had been violated. Tronox, Inc. also established and maintains engineering controls in the form of a fence around the facility and the capped landfills to restrict access and protect the integrity of the remedy.

The contaminated groundwater discharges to four different surface streams. These streams are not currently domestic drinking water sources, but have been affected by the KMCC site. Currently Big Spring and Finch Spring have concentrations of the COCs above the RBCs.

**7.2 Question B: Are the exposure assumptions, toxicity data, cleanup levels, and remedial action objectives (RAOs) used at the time of the remedy selection still valid?**

No. There is one change in the ARARs that could affect the site cleanup. The MCL for arsenic has been changed from 50 µg/L to 10 µg/L. There is one on-site monitoring well that currently has arsenic concentrations greater than 10 µg/L; 90 µg/L at KM-8. The long-term monitoring data (1991-2007) show no discernible trend for arsenic at this well. However, since installation



of the calcine cap in 2001, there does appear to be a downward trend in arsenic concentrations, though levels remain above the MCL. In order to determine whether the MCL will be met at this location (as well as others), it is recommended that the groundwater detection and reporting limits need to be reduced to less than the MCL for arsenic.

Tronox, Inc. purchased the property directly south of the facility that has been impacted by the contaminant plume. This action was taken to maintain control over land use of the impacted property and prevent potential exposure due to changes in land use.

**7.3 Question C: Has any other information come to light that could call into question the protectiveness of the remedy?**

No.

**7.4 Technical Assessment Summary**

According to the data reviewed, the site inspection, and the interviews, the remedy has been constructed as intended by the ROD and ROD Amendment. There have been no changes in the physical conditions of the site that would affect the protectiveness of the remedy. Monitoring of the groundwater, however, reveals that RBCs are not being met and data trends are relatively flat or increasing in some cases such that remediation goals are not likely to be met for at least another 20 years.

No changes in standards or toxicity factors for the COCs except for arsenic have been made that would affect the protectiveness of the remedy, as was noted in the First Five-Year Review. The MCL for arsenic has been changed from 50 µg/L to 10 µg/L. Only one well (KM-8) currently exceeds the MCL, at 90 µg/L.

**8.0 Issues**

**Table 4 Issues**

| <b>Issue</b>  | <b>Currently Affects<br/>Protectiveness<br/>(Yes/No)</b> | <b>Affects Future<br/>Protectiveness<br/>(Yes/No)</b> |
|---|--|---|
| Concentrations of chemicals of concern in groundwater and surface waters remain above RBCs and are exhibiting either flat or upward trends. | No   | Yes   |
| The routine laboratory reporting limit for arsenic in groundwater is greater than the updated MCL.  | No   | Yes   |

## 9.0 Recommendations and Follow-up Actions

**Table 5 Recommendations and Follow-Up Actions**

| Issue  | Recommendations/<br>Follow-Up Actions  | Party<br>Responsible | Oversight<br>Agency | Milestone<br>Date | Follow-Up<br>Action Affects<br>Protectiveness<br>(Yes/No) |        |
|--|--|----------------------|---------------------|-------------------|---|--------|
|  |  |                      |                     |                   | Current   | Future |
| Concentrations of COCs in groundwater and surface waters remain above RBCs and are exhibiting either flat or upward trends | Evaluate practicability of remedy in achieving cleanup goals   | Tronox, Inc.         | State/EPA           | 12/31/08          | No  | Yes    |
|  | Evaluate adequacy of current groundwater monitoring network for identifying the offsite migration of COCs  | Tronox, Inc./EPA     |                     | 9/30/08           | No  | Yes    |
|  | Assess whether current groundwater and surface water performance standards are still applicable  | EPA                  |                     | 9/30/08           | No  | Yes    |
| The routine laboratory reporting limit for arsenic in groundwater is greater than the updated MCL                          | Work with the laboratory providing analytical services to reduce the groundwater detection and reporting limits to less than the MCL for arsenic | Tronox, Inc.         | State/EPA           | 3/30/08           | No  | Yes    |

## 10.0 Protectiveness Statement

A protectiveness determination of the remedy cannot be made until further information is obtained. Further information will be obtained by taking the following actions:

- Evaluate practicability of remedy in achieving cleanup goals;

- Evaluate adequacy of current groundwater monitoring network for identifying the offsite migration of COCs;
- Assess whether current groundwater and surface water performance standards are still applicable; and
- Work with the laboratory providing analytical services to reduce the groundwater detection and reporting limits to less than the MCL for arsenic.

It is expected that these actions will take approximately fifteen months to complete, at which time a determination of protectiveness will be made.

### **11.0 Next Review**

The next Five-Year Review for the KMCC site is required by September 2012, five years from the date of this review.

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## **Attachment 1**

### **Site Maps**

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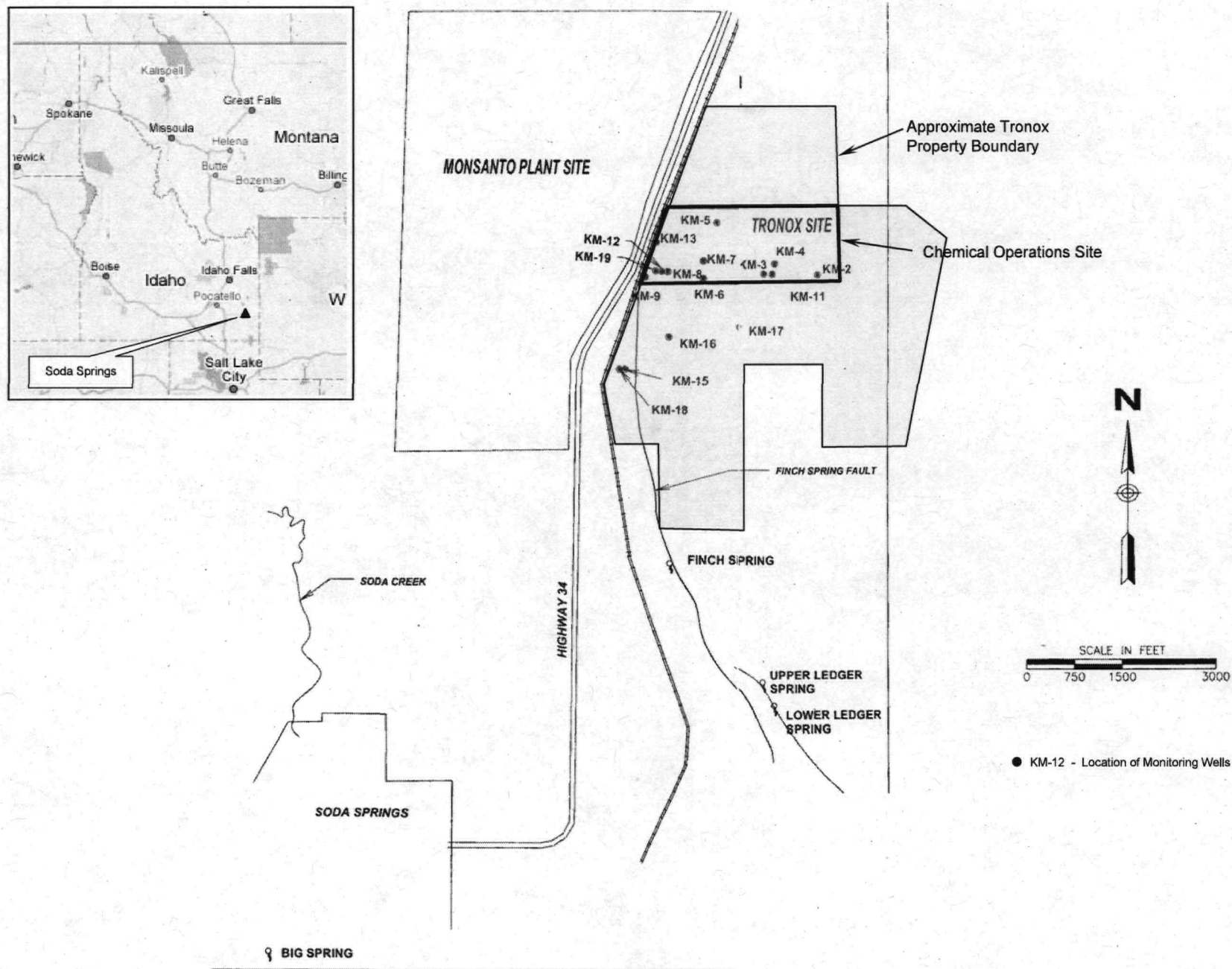


Figure 1 - Location Map



Photo - Sept 2000

Figure 2  
Site Map – Tronox Facility Features



**Attachment 2**  
**Public Notification**

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"Just a Cowboy."

And we couldn't resist adding  
this from a correspondence from  
Paul:



233-8875

797 Hospital Way

Aug 07 2007

July 19, 2007 Caribou County Sun



## **EPA to Review Kerr-McGee Chemical Corp. Superfund Site Remedy**

The U.S. Environmental Protection Agency (EPA) is doing the second Five-Year Review of the Kerr-McGee Chemical Corporation Superfund site, located on a 158-acre parcel of land one mile north of Soda Springs Idaho.

The review will insure that the waste cleanup put in place by the Kerr-McGee Corporation from 1997 to 2001 remains effective. The cleanup included the removal of two of the three waste ponds, disposal of 13,000 yards of pond sediment, and construction of an on-site landfill. Kerr-McGee stopped all liquid wastes draining into the calcine impounds and capped the calcine tailings in place in 2001. Ground water monitoring continues south of the Kerr McGee plant. Reviews are required at least every five years when a remedy leaves waste in place above levels that allow for unrestricted use and unlimited exposure.

**How You Can Get Involved:** EPA welcomes your participation during our review, in July and August, 2007. If you have information that may help EPA with the review, contact Tim Brincefield, EPA Project Manager, by phone at 206-553-2100 or toll free at 800-424-4372. Email: [brincefield.timothy@epa.gov](mailto:brincefield.timothy@epa.gov).

TTY users may call the Federal Relay Service at 800 877-8339 and give the operator Mr. Brincefield's phone number.



U.S. Environmental Protection Agency  
1200 Sixth Avenue, ETPA-081  
Seattle, Washington 98101-11128

*Kerr-McGee Chemical Corp.  
5-Year Review  
Soda Springs, Idaho  
July 2007*



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TTY users may call the Federal Relay Service at 800 877-8339 and give the operator Mr. Brincefield's number.

### **Attachment 3**

#### **List of Documents Reviewed**

Global Environmental Technologies, LLC, Remedial Action, 2001 Annual Comprehensive Report of Groundwater Quality, Kerr-McGee Chemical LLC, Soda Springs, Idaho Facility, dated June 13, 2002.

Global Environmental Technologies, LLC, Remedial Action, 2006 Annual Comprehensive Report of Ground and Surface Water Quality, Kerr-McGee Chemical LLC, Soda Springs, Idaho Facility, dated October 22, 2006.

Global Environmental Technologies, LLC, Remedial Action, 2007 Summary of Monitoring Data through May 2007, Kerr-McGee Chemical LLC, Soda Springs, Idaho Facility, dated August 3, 2007.

U.S. Environmental Protection Agency, Record of Decision, Kerr-McGee, Soda Springs, dated September 28, 1995.

U.S. Environmental Protection Agency, Record of Decision Amendment, Kerr-McGee, Soda Springs, dated September 13, 2000.

U.S. Environmental Protection Agency, First Five-Year Review Report, Kerr-McGee Superfund Site, Soda Springs, Idaho, dated September 2002.

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## **Attachment 4**

### **Site Inspection Checklist**

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## Site Inspection Checklist

| I. SITE INFORMATION   |   |   |                             |  |   |
|---|---|---|-----------------------------|--|---|
| Site name: <b>TRONOX SODA SPRINGS, IDAHO FACILITY (FORMERLY Kerr-McGee Chemical LLC)</b>  |   | Date of inspection: <b>07/25/07</b>                           |                             |  |   |
| Location and Region: <b>Soda Springs, Idaho REGION X</b>  |   | EPA ID: <b>IDD041310707</b>                                   |                             |  |   |
| Agency, office, or company leading the Five-Year Review: <b>US Army Corps of Engineers - Seattle District</b>   |   | Weather/temperature: <b>Partly cloudy, hot, ~92 degrees F</b> |                             |  |   |
| <b>Remedy Includes:</b> (Check all that apply) <table border="0" style="width: 100%;"> <tr> <td style="vertical-align: top;"> <input checked="" type="checkbox"/> <b>Landfill cover/containment</b><br/> <input checked="" type="checkbox"/> <b>Access controls</b><br/> <input checked="" type="checkbox"/> <b>Institutional controls</b><br/> <input type="checkbox"/> Groundwater pump and treatment<br/> <input type="checkbox"/> Surface water collection and treatment<br/> <input type="checkbox"/> Other _____         </td> <td style="vertical-align: top;"> <input checked="" type="checkbox"/> <b>Monitored natural attenuation</b><br/> <input type="checkbox"/> Groundwater containment<br/> <input type="checkbox"/> Vertical barrier walls         </td> </tr> </table> |   |   |                             | <input checked="" type="checkbox"/> <b>Landfill cover/containment</b><br><input checked="" type="checkbox"/> <b>Access controls</b><br><input checked="" type="checkbox"/> <b>Institutional controls</b><br><input type="checkbox"/> Groundwater pump and treatment<br><input type="checkbox"/> Surface water collection and treatment<br><input type="checkbox"/> Other _____ | <input checked="" type="checkbox"/> <b>Monitored natural attenuation</b><br><input type="checkbox"/> Groundwater containment<br><input type="checkbox"/> Vertical barrier walls |
| <input checked="" type="checkbox"/> <b>Landfill cover/containment</b><br><input checked="" type="checkbox"/> <b>Access controls</b><br><input checked="" type="checkbox"/> <b>Institutional controls</b><br><input type="checkbox"/> Groundwater pump and treatment<br><input type="checkbox"/> Surface water collection and treatment<br><input type="checkbox"/> Other _____  | <input checked="" type="checkbox"/> <b>Monitored natural attenuation</b><br><input type="checkbox"/> Groundwater containment<br><input type="checkbox"/> Vertical barrier walls |   |                             |  |   |
| <b>Attachments:</b> <input checked="" type="checkbox"/> Inspection team roster attached <input checked="" type="checkbox"/> Site map attached   |   |   |                             |  |   |
| II. INTERVIEWS (Check all that apply)   |   |   |                             |  |   |
| 1. O&M site manager   | <b><u>Boyd Schvaneveldt</u></b>   | <b><u>Site Manager</u></b>                                    | <b><u>July 25, 2007</u></b> |  |   |
|   | Name  | Title   | Date                        |  |   |
| <b>Interviewed</b> <input checked="" type="checkbox"/> <b><u>at site</u></b> <input type="checkbox"/> G at office <input type="checkbox"/> G by phone <b>Phone no. <u>208-547-3331 ext 230</u></b>  |   |   |                             |  |   |
| Problems, suggestions; <input type="checkbox"/> Report attached _____   |   |   |                             |  |   |
|   |   |   |                             |  |   |
| 2. O&M staff  | <b><u>John S. Brown, P.G. dba Global Environmental Tech LLC</u></b>   | <b><u>July 25, 2007</u></b>                                   |                             |  |   |
|   | Name  | Title   | Date                        |  |   |
| <b>Interviewed</b> <input checked="" type="checkbox"/> <b><u>at site</u></b> <input type="checkbox"/> G at office <input type="checkbox"/> G by phone <b>Phone no. <u>801-463-0902</u></b>  |   |   |                             |  |   |
| Problems, suggestions; <input type="checkbox"/> Report attached _____   |   |   |                             |  |   |

- Agency IDEQ  
 Contact Doug Tanner Regional Environmental Manager 7/07 208-236-6160  
 Name Title Date Phone no.  
 Problems; suggestions; ☐ Report attached \_\_\_\_\_

Agency City of Soda Springs  
Contact \_\_\_\_\_  
Name \_\_\_\_\_ Title \_\_\_\_\_ Date 7/07 Phone no. (208) 547-2600  
Problems; suggestions; ☐ Report attached \_\_\_\_\_

Agency **Caribou Co. Public Safety**  
Contact \_\_\_\_\_ Title \_\_\_\_\_ Date **7/07** Phone no. **(208) 547-2583**  
Name \_\_\_\_\_  
Problems; suggestions; ☐ Report attached \_\_\_\_\_

Agency Emergency Response  
Contact \_\_\_\_\_ 7/07 (208) 547-2583

\_\_\_\_\_  
Name Title Date Phone no.

Problems; suggestions; ☐ Report attached \_\_\_\_\_

- Last public meeting held in 2001.

Public notice for FYR published in local paper (Sun) in 7/19/07.

No tribal interest of local public groups.

[illegible]

| III. ON-SITE DOCUMENTS & RECORDS VERIFIED (Check all that apply)   |  |  |  |  |
|--|--|--|--|--|
| 1.   | <b>O&amp;M Documents</b><br><input checked="" type="checkbox"/> <b>O&amp;M manual</b><br><input checked="" type="checkbox"/> <b>As-built drawings</b><br><input checked="" type="checkbox"/> <b>Maintenance logs</b>             | <input checked="" type="checkbox"/> <b>Readily available</b><br><input checked="" type="checkbox"/> <b>Readily available</b><br><input type="checkbox"/> Readily available           | <input type="checkbox"/> Up to date<br><input type="checkbox"/> Up to date<br><input type="checkbox"/> Up to date  | <input type="checkbox"/> N/A<br><input type="checkbox"/> N/A<br><input type="checkbox"/> N/A   |
| Remarks O&M is for the cap only. Covers inspection of the landfill cap. Landfill water level controlled by sump to concrete evaporation pond. No weeds or trees. IC controls in place. |  |  |  |  |
| 2.   | <b>Site-Specific Health and Safety Plan</b><br><input type="checkbox"/> Contingency plan/emergency response plan   | <input checked="" type="checkbox"/> <b>Readily available</b><br><input type="checkbox"/> Readily available   | <input type="checkbox"/> Up to date<br><input type="checkbox"/> Up to date   | <input type="checkbox"/> N/A<br><input type="checkbox"/> N/A   |
| Remarks  |  |  |  |  |
| 3.   | <b>O&amp;M and OSHA Training Records</b><br>Remarks  | <input checked="" type="checkbox"/> <b>Readily available</b>   | <input type="checkbox"/> Up to date  | N/A  |
| Site is an OSHA Star site since 1987. No reportable accidents.   |  |  |  |  |
| 4.   | <b>Permits and Service Agreements</b><br><input type="checkbox"/> Air discharge permit<br><input type="checkbox"/> Effluent discharge<br><input type="checkbox"/> Waste disposal, POTW<br><input type="checkbox"/> Other permits | <input type="checkbox"/> Readily available<br><input type="checkbox"/> Readily available<br><input type="checkbox"/> Readily available<br><input type="checkbox"/> Readily available | <input type="checkbox"/> Up to date<br><input type="checkbox"/> Up to date<br><input type="checkbox"/> Up to date<br><input type="checkbox"/> Up to date | <input checked="" type="checkbox"/> <b>N/A</b><br><input checked="" type="checkbox"/> <b>N/A</b><br><input checked="" type="checkbox"/> <b>N/A</b><br><input checked="" type="checkbox"/> <b>N/A</b> |
| Remarks  |  |  |  |  |
| 5.   | <b>Gas Generation Records</b><br>Remarks   | <input type="checkbox"/> Readily available   | <input type="checkbox"/> Up to date  | <input checked="" type="checkbox"/> <b>N/A</b>   |
| Remarks  |  |  |  |  |
| 6.   | <b>Settlement Monument Records</b><br>Remarks  | <input type="checkbox"/> Readily available   | <input type="checkbox"/> Up to date  | <input checked="" type="checkbox"/> <b>N/A</b>   |
| None, site is compacted.   |  |  |  |  |
| 7.   | <b>Groundwater Monitoring Records</b><br>Remarks   | <input checked="" type="checkbox"/> <b>Readily available</b>   | <input type="checkbox"/> Up to date  | <input type="checkbox"/> N/A   |
| On site and available to review.   |  |  |  |  |
| 8.   | <b>Leachate Extraction Records</b><br>Remarks  | <input type="checkbox"/> Readily available   | <input type="checkbox"/> Up to date  | <input checked="" type="checkbox"/> <b>N/A</b>   |
| Remarks  |  |  |  |  |
| 9.   | <b>Discharge Compliance Records</b><br><input type="checkbox"/> Air<br><input type="checkbox"/> Water (effluent)   | <input type="checkbox"/> Readily available<br><input type="checkbox"/> Readily available   | <input type="checkbox"/> Up to date<br><input type="checkbox"/> Up to date   | <input checked="" type="checkbox"/> <b>N/A</b><br><input checked="" type="checkbox"/> <b>N/A</b>   |
| Remarks  |  |  |  |  |
| 10.  | <b>Daily Access/Security Logs</b><br>Remarks   | <input type="checkbox"/> Readily available   | <input type="checkbox"/> Up to date  | <input checked="" type="checkbox"/> <b>N/A</b>   |
| Site is gated and a daily sign-in and sign-out log is maintained.  |  |  |  |  |

#### IV. O&M COSTS

1. **O&M Organization**

☐ State in-house

☐ Contractor for State

☒ **PRP in-house**

☒ **Contractor for PRP**

☐ Federal Facility in-house

☐ Contractor for Federal Facility

☐ Other \_\_\_\_\_

2. **O&M Cost Records**

☐ Readily available

☐ Up to date

☒ **Funding mechanism/agreement in place**

Original O&M cost estimate **\$1,000,000** ☐ Breakdown attached

Total annual cost by year for review period if available

From \_\_\_\_\_ To \_\_\_\_\_ ☐ Breakdown attached  
Date Date Total cost

From \_\_\_\_\_ To \_\_\_\_\_ ☐ Breakdown attached  
Date Date Total cost

From \_\_\_\_\_ To \_\_\_\_\_ ☐ Breakdown attached  
Date Date Total cost

From \_\_\_\_\_ To \_\_\_\_\_ ☐ Breakdown attached  
Date Date Total cost

From \_\_\_\_\_ To \_\_\_\_\_ ☐ Breakdown attached  
Date Date Total cost

3. **Unanticipated or Unusually High O&M Costs During Review Period**

Describe costs and reasons: \_\_\_\_\_ Nothing to report.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

#### V. ACCESS AND INSTITUTIONAL CONTROLS ☐ Applicable ☐ N/A

##### A. Fencing

1. **Fencing** ☐ Location shown on site map ☒ **Gates secured** ☐ N/A  
Remarks \_\_\_\_\_ No damage observed.

##### B. Other Access Restrictions

1. **Signs and other security measures** ☒ **Location shown on site map** ☐ N/A  
Remarks \_\_\_\_\_ Signs on all gates. 24/7 operations.

**C. Institutional Controls (ICs)****1. Implementation and enforcement**

Site conditions imply ICs properly implemented

☒ **Yes** ☐ No ☐ N/A

Site conditions imply ICs being fully enforced

☒ **Yes** ☐ No ☐ N/AType of monitoring (e.g., self-reporting, drive by) Tronox ICs in deed restrictions to property/Soda Springs city ordinances to hook up to city waterFrequency Continuous

Responsible party/agency \_\_\_\_\_

Contact City of Soda Springs, ID7/25/07(208) 547-2600

Name

Title

Date

Phone no.

Reporting is up-to-date

☐ Yes ☐ No ☐ N/A

Reports are verified by the lead agency

☐ Yes ☐ No ☐ N/A

Specific requirements in deed or decision documents have been met

☐ Yes ☐ No ☐ N/A

Violations have been reported

☐ Yes ☐ No ☐ N/AOther problems or suggestions: ☐ Report attached**2. Adequacy**☒ **ICs are adequate**☐ ICs are inadequate☐ N/A

Remarks \_\_\_\_\_

**D. General****1. Vandalism/trespassing**☐ Location shown on site map☒ **No vandalism evident**

Remarks \_\_\_\_\_

**2. Land use changes on site**☒ **N/A**

Remarks \_\_\_\_\_

**3. Land use changes off site**☒ **N/A**

Remarks \_\_\_\_\_ Property ownership transferred to Tronox in 2004. No change in land use.

**VI. GENERAL SITE CONDITIONS****A. Roads**☐ Applicable☐ N/A**1. Roads damaged**☐ Location shown on site map☒ **Roads adequate**☐ N/A

Remarks \_\_\_\_\_

|  |   |   |  |
|--|---|---|--|
| <b>B. Other Site Conditions</b>  |   |   |  |
| Remarks _____  |   |   |  |
| <b>VII. LANDFILL COVERS    <u>X Applicable</u>    <input type="checkbox"/> N/A</b> |   |   |  |
| <b>A. Landfill Surface</b>   |   |   |  |
| 1.   | <b>Settlement (Low spots)</b><br>Areal extent _____<br>Remarks _____  | <input type="checkbox"/> Location shown on site map<br>Depth _____  | <u><b>X Settlement not evident</b></u>     |
| 2.   | <b>Cracks</b><br>Lengths _____ Widths _____ Depths _____<br>Remarks _____   | <input type="checkbox"/> Location shown on site map<br>Depths _____ | <u><b>X Cracking not evident</b></u>       |
| 3.   | <b>Erosion</b><br>Areal extent _____<br>Remarks _____   | <input type="checkbox"/> Location shown on site map<br>Depth _____  | <u><b>X Erosion not evident</b></u>        |
| 4.   | <b>Holes</b><br>Areal extent _____<br>Remarks _____   | <input type="checkbox"/> Location shown on site map<br>Depth _____  | <input type="checkbox"/> Holes not evident |
| 5.   | <b>Vegetative Cover</b> <u><b>X Grass</b></u> <u><b>X Cover properly established</b></u> <input type="checkbox"/> No signs of stress<br><input type="checkbox"/> Trees/Shrubs (indicate size and locations on a diagram)<br>Remarks _____ <u><b>No Trees, spraying for weeds required.</b></u>  |   |  |
| 6.   | <b>Alternative Cover (armored rock, concrete, etc.)</b> <u><b>X N/A</b></u><br>Remarks _____  |   |  |
| 7.   | <b>Bulges</b><br>Areal extent _____<br>Remarks _____  | <input type="checkbox"/> Location shown on site map<br>Height _____ | <u><b>X Bulges not evident</b></u>         |
| 8.   | <b>Wet Areas/Water Damage</b> <u><b>X Wet areas/water damage not evident</b></u><br><input type="checkbox"/> Wet areas <input type="checkbox"/> Location shown on site map        Areal extent _____<br><input type="checkbox"/> Ponding <input type="checkbox"/> Location shown on site map        Areal extent _____<br><input type="checkbox"/> Seeps <input type="checkbox"/> Location shown on site map        Areal extent _____<br><input type="checkbox"/> Soft subgrade <input type="checkbox"/> Location shown on site map        Areal extent _____<br>Remarks _____ |   |  |
| 9.   | <b>Slope Instability</b> <input type="checkbox"/> Slides <input type="checkbox"/> Location shown on site map <u><b>X No evidence of slope instability</b></u><br>Areal extent _____<br>Remarks _____ Nothing steeper than 3/1. Mostly 6/1.  |   |  |

|  |   |  |
|--|---|--|
| <b>B. Benches</b> <input type="checkbox"/> Applicable <b><u>X N/A</u></b><br>(Horizontally constructed mounds of earth placed across a steep landfill side slope to interrupt the slope in order to slow down the velocity of surface runoff and intercept and convey the runoff to a lined channel.)  |   |  |
| 1.   | <b>Flows Bypass Bench</b><br>Remarks _____  | <input type="checkbox"/> Location shown on site map <b><u>X N/A or okay</u></b>                |
| 2.   | <b>Bench Breached</b><br>Remarks _____  | <input type="checkbox"/> Location shown on site map <b><u>X N/A or okay</u></b>                |
| 3.   | <b>Bench Overtopped</b><br>Remarks _____  | <input type="checkbox"/> Location shown on site map <b><u>X N/A or okay</u></b>                |
| <b>C. Letdown Channels</b> <input type="checkbox"/> Applicable <b><u>X N/A</u></b><br>(Channel lined with erosion control mats, riprap, grout bags, or gabions that descend down the steep side slope of the cover and will allow the runoff water collected by the benches to move off of the landfill cover without creating erosion gullies.) |   |  |
| 1.   | <b>Settlement</b><br>Areal extent _____      Depth _____<br>Remarks _____                   | <input type="checkbox"/> Location shown on site map <b><u>X No evidence of settlement</u></b>  |
| 2.   | <b>Material Degradation</b><br>Material type _____      Areal extent _____<br>Remarks _____ | <input type="checkbox"/> Location shown on site map <b><u>X No evidence of degradation</u></b> |
| 3.   | <b>Erosion</b><br>Areal extent _____      Depth _____<br>Remarks _____                      | <input type="checkbox"/> Location shown on site map <b><u>X No evidence of erosion</u></b>     |

|   |   |   |  |
|---|---|---|--|
| 4.  | <b>Undercutting</b><br>Areal extent _____<br>Depth _____<br>Remarks _____   | <input type="checkbox"/> Location shown on site map<br><input checked="" type="checkbox"/> <b>No evidence of undercutting</b>   |  |
| 5.  | <b>Obstructions</b> Type _____<br><input type="checkbox"/> Location shown on site map<br>Size _____<br>Remarks _____  | <input checked="" type="checkbox"/> <b>No obstructions</b><br>Areal extent _____  |  |
| 6.  | <b>Excessive Vegetative Growth</b> Type _____<br><input checked="" type="checkbox"/> <b>No evidence of excessive growth</b><br><input type="checkbox"/> Vegetation in channels does not obstruct flow<br><input type="checkbox"/> Location shown on site map<br>Remarks _____ | Areal extent _____  |  |
| <b>D. Cover Penetrations</b> <input type="checkbox"/> Applicable <input checked="" type="checkbox"/> <b>N/A</b> |   |   |  |
| 1.  | <b>Gas Vents</b><br><input type="checkbox"/> Properly secured/locked<br><input type="checkbox"/> Evidence of leakage at penetration<br><u>fl N/A</u><br>Remarks _____   | <input type="checkbox"/> Active <input type="checkbox"/> Passive<br><input type="checkbox"/> Functioning <input type="checkbox"/> Routinely sampled<br><input type="checkbox"/> Needs Maintenance | <input type="checkbox"/> Good condition  |
| 2.  | <b>Gas Monitoring Probes</b><br><input type="checkbox"/> Properly secured/locked<br><input type="checkbox"/> Evidence of leakage at penetration<br>Remarks _____  | <input type="checkbox"/> Functioning <input type="checkbox"/> Routinely sampled<br><input type="checkbox"/> Needs Maintenance   | <input type="checkbox"/> Good condition<br><input checked="" type="checkbox"/> <b>N/A</b>    |
| 3.  | <b>Monitoring Wells (within surface area of landfill)</b><br><input checked="" type="checkbox"/> <b>Properly secured/locked</b><br><input type="checkbox"/> Evidence of leakage at penetration<br>Remarks _____   | <input checked="" type="checkbox"/> <b>Functioning</b><br><input type="checkbox"/> Needs Maintenance  | <input checked="" type="checkbox"/> <b>Routinely sampled</b><br><input type="checkbox"/> N/A |
| 4.  | <b>Leachate Extraction Wells</b><br><input type="checkbox"/> Properly secured/locked<br><input type="checkbox"/> Evidence of leakage at penetration<br>Remarks _____  | <input type="checkbox"/> Functioning <input type="checkbox"/> Routinely sampled<br><input type="checkbox"/> Needs Maintenance   | <input type="checkbox"/> Good condition<br><input checked="" type="checkbox"/> <b>N/A</b>    |
| 5.  | <b>Settlement Monuments</b><br>Remarks _____  | <input type="checkbox"/> Located <input type="checkbox"/> Routinely surveyed  | <input checked="" type="checkbox"/> <b>N/A</b>   |



|   |  |   |   |                              |
|---|--|---|---|------------------------------|
| <b>E. Gas Collection and Treatment</b>  |  |   | <input type="checkbox"/> Applicable                   | <u>fl N/A</u>                |
| 1.                                      | <b>Gas Treatment Facilities</b><br><input type="checkbox"/> Flaring <input type="checkbox"/> Thermal destruction <input type="checkbox"/> Collection for reuse<br><input type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance<br>Remarks _____<br>_____ |   |   |                              |
| 2.                                      | <b>Gas Collection Wells, Manifolds and Piping</b><br><input type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance<br>Remarks _____<br>_____  |   |   |                              |
| 3.                                      | <b>Gas Monitoring Facilities</b> (e.g., gas monitoring of adjacent homes or buildings)<br><input type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance <input type="checkbox"/> N/A<br>Remarks _____<br>_____  |   |   |                              |
| <b>F. Cover Drainage Layer</b>          |  |   | <input checked="" type="checkbox"/> <b>Applicable</b> | <input type="checkbox"/> N/A |
| 1.                                      | <b>Outlet Pipes Inspected</b><br>Remarks _____<br>_____  | <input type="checkbox"/> Functioning                              | <u><b>X N/A</b></u>                                   |                              |
| 2.                                      | <b>Outlet Rock Inspected</b><br>Remarks _____<br>_____   | <input type="checkbox"/> Functioning                              | <u><b>X N/A</b></u>                                   |                              |
| <b>G. Detention/Sedimentation Ponds</b> |  |   | <input type="checkbox"/> Applicable                   | <u><b>X N/A</b></u>          |
| 1.                                      | <b>Siltation</b> Areal extent _____ Depth _____<br><input type="checkbox"/> Siltation not evident<br>Remarks _____<br>_____  |   | <u><b>X N/A</b></u>                                   |                              |
| 2.                                      | <b>Erosion</b> Areal extent _____ Depth _____<br><input type="checkbox"/> Erosion not evident<br>Remarks _____<br>_____  |   |   |                              |
| 3.                                      | <b>Outlet Works</b><br>Remarks _____<br>_____  | <input type="checkbox"/> Functioning <input type="checkbox"/> N/A |   |                              |
| 4.                                      | <b>Dam</b><br>Remarks _____<br>_____   | <input type="checkbox"/> Functioning <input type="checkbox"/> N/A |   |                              |

|  |   |                                     |  |
|--|---|-------------------------------------|--|
| <b>H. Retaining Walls</b>                      |   | <input type="checkbox"/> Applicable | <input checked="" type="checkbox"/> <b>N/A</b> |
| 1.   | <b>Deformations</b> <input type="checkbox"/> Location shown on site map <input type="checkbox"/> Deformation not evident<br>Horizontal displacement _____ Vertical displacement _____<br>Rotational displacement _____<br>Remarks _____ |                                     |  |
| 2.   | <b>Degradation</b> <input type="checkbox"/> Location shown on site map <input type="checkbox"/> Degradation not evident<br>Remarks _____  |                                     |  |
| <b>I. Perimeter Ditches/Off-Site Discharge</b> |   | <input type="checkbox"/> Applicable | <input checked="" type="checkbox"/> <b>N/A</b> |
| 1.   | <b>Siltation</b> <input type="checkbox"/> Location shown on site map <input type="checkbox"/> Siltation not evident<br>Areal extent _____ Depth _____<br>Remarks _____  |                                     |  |
| 2.   | <b>Vegetative Growth</b> <input type="checkbox"/> Location shown on site map <input type="checkbox"/> N/A<br><input type="checkbox"/> Vegetation does not impede flow<br>Areal extent _____ Type _____<br>Remarks _____                 |                                     |  |
| 3.   | <b>Erosion</b> <input type="checkbox"/> Location shown on site map <input type="checkbox"/> Erosion not evident<br>Areal extent _____ Depth _____<br>Remarks _____  |                                     |  |
| 4.   | <b>Discharge Structure</b> <input type="checkbox"/> Functioning <input type="checkbox"/> N/A<br>Remarks _____   |                                     |  |
| <b>VIII. VERTICAL BARRIER WALLS</b>            |   | <input type="checkbox"/> Applicable | <input checked="" type="checkbox"/> <b>N/A</b> |
| 1.   | <b>Settlement</b> <input type="checkbox"/> Location shown on site map <input type="checkbox"/> Settlement not evident<br>Areal extent _____ Depth _____<br>Remarks _____  |                                     |  |
| 2.   | <b>Performance Monitoring</b> Type of monitoring _____<br><input type="checkbox"/> Performance not monitored<br>Frequency _____ <input type="checkbox"/> Evidence of breaching<br>Head differential _____<br>Remarks _____              |                                     |  |

|   |  |                                  |
|---|--|----------------------------------|
| <b>IX. GROUNDWATER/SURFACE WATER REMEDIES</b>   |  | G Applicable <b><u>X N/A</u></b> |
| <b>A. Groundwater Extraction Wells, Pumps, and Pipelines G Applicable <u>X N/A</u></b>        |  |                                  |
| 1.  | <b>Pumps, Wellhead Plumbing, and Electrical</b><br>G Good condition G All required wells properly operating G Needs Maintenance <b><u>X N/A</u></b><br>Remarks _____ |                                  |
| 2.  | <b>Extraction System Pipelines, Valves, Valve Boxes, and Other Appurtenances</b><br>G Good condition G Needs Maintenance<br>Remarks _____                            |                                  |
| 3.  | <b>Spare Parts and Equipment</b><br>G Readily available G Good condition G Requires upgrade G Needs to be provided<br>Remarks _____                                  |                                  |
| <b>B. Surface Water Collection Structures, Pumps, and Pipelines G Applicable <u>X N/A</u></b> |  |                                  |
| 1.  | <b>Collection Structures, Pumps, and Electrical</b><br>G Good condition G Needs Maintenance<br>Remarks _____   |                                  |
| 2.  | <b>Surface Water Collection System Pipelines, Valves, Valve Boxes, and Other Appurtenances</b><br>G Good condition G Needs Maintenance<br>Remarks _____              |                                  |
| 3.  | <b>Spare Parts and Equipment</b><br>G Readily available G Good condition G Requires upgrade G Needs to be provided<br>Remarks _____                                  |                                  |

|   |  |  |
|---|--|--|
| <b>C. Treatment System</b> <input type="checkbox"/> Applicable <input checked="" type="checkbox"/> <b>N/A</b> |  |  |
| 1.  | <b>Treatment Train</b> (Check components that apply)<br><input type="checkbox"/> Metals removal <input type="checkbox"/> Oil/water separation <input type="checkbox"/> Bioremediation<br><input type="checkbox"/> Air stripping <input type="checkbox"/> Carbon adsorbers<br><input type="checkbox"/> Filters<br><input type="checkbox"/> Additive (e.g., chelation agent, flocculent)<br><input type="checkbox"/> Others<br><input type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance<br><input type="checkbox"/> Sampling ports properly marked and functional<br><input type="checkbox"/> Sampling/maintenance log displayed and up to date<br><input type="checkbox"/> Equipment properly identified<br><input type="checkbox"/> Quantity of groundwater treated annually<br><input type="checkbox"/> Quantity of surface water treated annually<br>Remarks |  |
| 2.  | <b>Electrical Enclosures and Panels</b> (properly rated and functional)<br><input checked="" type="checkbox"/> <b>N/A</b> <input type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance<br>Remarks  |  |
| 3.  | <b>Tanks, Vaults, Storage Vessels</b><br><input type="checkbox"/> N/A <input type="checkbox"/> Good condition <input type="checkbox"/> Proper secondary containment <input type="checkbox"/> Needs Maintenance<br>Remarks  |  |
| 4.  | <b>Discharge Structure and Appurtenances</b><br><input type="checkbox"/> N/A <input type="checkbox"/> Good condition <input type="checkbox"/> Needs Maintenance<br>Remarks   |  |
| 5.  | <b>Treatment Building(s)</b><br><input checked="" type="checkbox"/> <b>N/A</b> <input type="checkbox"/> Good condition (esp. roof and doorways) <input type="checkbox"/> Needs repair<br><input type="checkbox"/> Chemicals and equipment properly stored<br>Remarks   |  |
| 6.  | <b>Monitoring Wells</b> (pump and treatment remedy)<br><input type="checkbox"/> Properly secured/locked <input type="checkbox"/> Functioning <input type="checkbox"/> Routinely sampled <input type="checkbox"/> Good condition<br><input type="checkbox"/> All required wells located <input type="checkbox"/> Needs Maintenance <input checked="" type="checkbox"/> <b>N/A</b><br>Remarks  |  |
| <b>D. Monitoring Data</b>   |  |  |
| 1.  | Monitoring Data<br><input checked="" type="checkbox"/> <b>Is routinely submitted on time</b> <input checked="" type="checkbox"/> <b>Is of acceptable quality (STL Denver)</b>  |  |
| 2.  | Monitoring data suggests:<br><input checked="" type="checkbox"/> Groundwater plume is effectively contained <input checked="" type="checkbox"/> Contaminant concentrations are declining   |  |

**D. Monitored Natural Attenuation**

1. **Monitoring Wells** (natural attenuation remedy)  
**fl Properly secured/locked**      **X Functioning**    **X Routinely sampled**    **X Good condition**  
**fl All required wells located**      ☐ Needs Maintenance      ☐ N/A  
Remarks \_\_\_\_\_

**X. OTHER REMEDIES**

If there are remedies applied at the site which are not covered above, attach an inspection sheet describing the physical nature and condition of any facility associated with the remedy. An example would be soil vapor extraction.

**XI. OVERALL OBSERVATIONS****A. Implementation of the Remedy**

Describe issues and observations relating to whether the remedy is effective and functioning as designed. Begin with a brief statement of what the remedy is to accomplish (i.e., to contain contaminant plume, minimize infiltration and gas emission, etc.).

Purpose is to contain contaminant plume. Actions taken to date have had a dramatic impact on GW concentrations. Need to continue monitoring to track decline of well concentrations in off site wells and surface water. Additional evaluation of "flattening" groundwater trends is warranted.

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**B. Adequacy of O&M**

Describe issues and observations related to the implementation and scope of O&M procedures. In particular, discuss their relationship to the current and long-term protectiveness of the remedy.

No issues identified.

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**C. Early Indicators of Potential Remedy Problems**

Describe issues and observations such as unexpected changes in the cost or scope of O&M or a high frequency of unscheduled repairs, that suggest that the protectiveness of the remedy may be compromised in the future.

No issues identified.

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**D. Opportunities for Optimization**

Describe possible opportunities for optimization in monitoring tasks or the operation of the remedy.

Vanadium plant removed. Planned removal of 10-acre pond and consolidation in 5 acre pond landfill (2-acre RCRA compliant) should further reduction of COC in GW.

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## **Attachment 5**

### **Photos Documenting Site Conditions**

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**10-Acre Pond Looking North**



Cal cine Cap

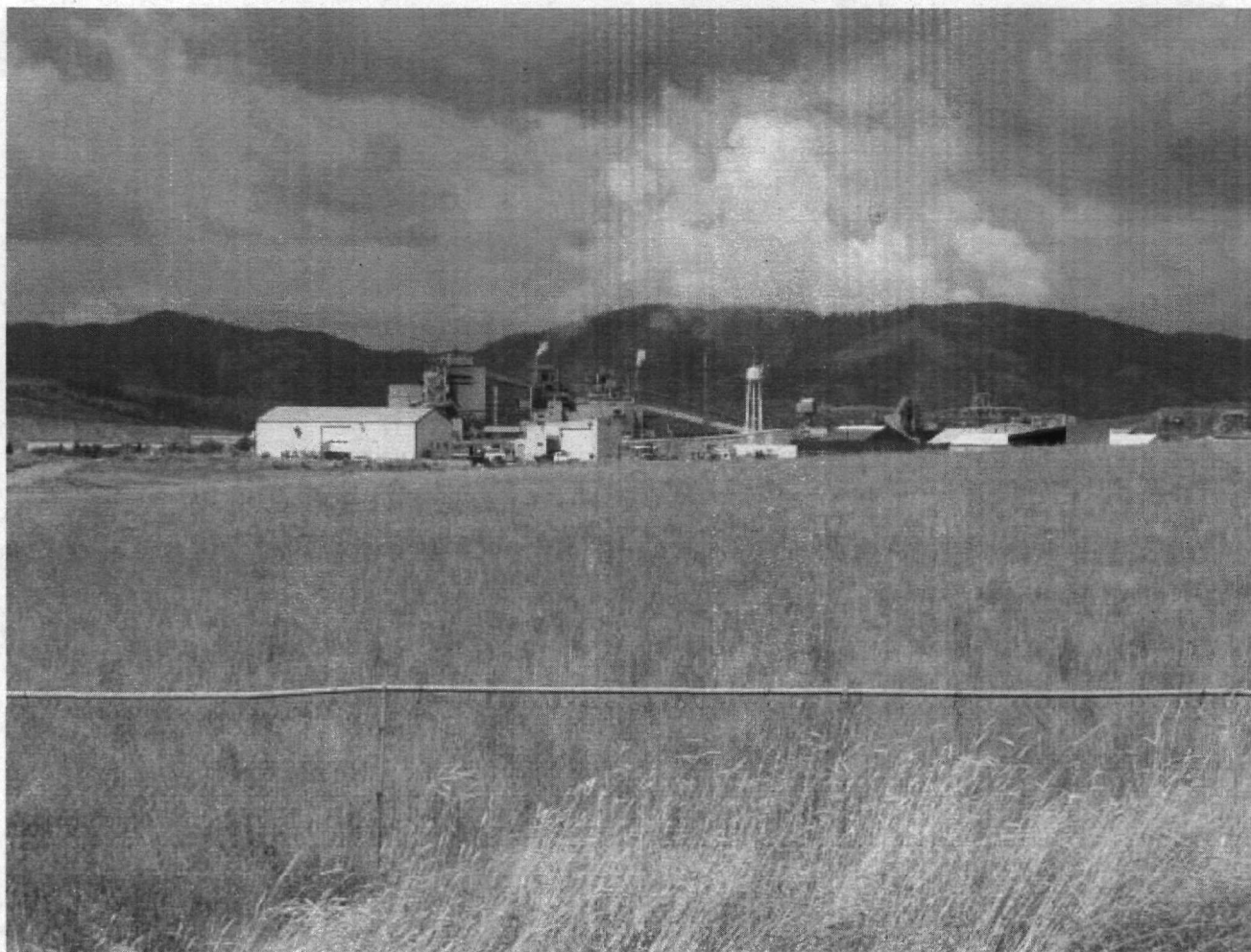


**Infiltration Pond**





**Location of Former Vanadium Building**



**Monsanto Plant West of Kerr-McGee (Tronox) Site**



**Off-Site Well Looking South**